

Case Number: 18 - CV - 4072 (PKC) (PK)

PROPOSED DISCOVERY PLAN			
	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	✓		
2. Rule 26(a)(1) disclosures exchanged	✓		
3. Requests made:			
a. Medical records authorization		✓	
b. Section 160.50 releases for arrest records		✓	
c. Identification of John Doe/Jane Doe defendants		✓	
d. Proposed Stipulation of Confidentiality		✓	
4. Procedures for producing Electronically Stored Information (ESI) discussed	✓		
B. SETTLEMENT			
1. Plaintiff to make settlement demand	✓		
2. Defendant to make settlement offer	✓		
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)		✓	
4. Settlement Conference (proposed date)	✓		
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings	✓		
2. Initial documents requests and interrogatories	✓		
3. All fact discovery to be completed (including disclosure of medical records)			Dec. 2
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			Dec. 6
5. Expert discovery (only if needed) Check here if not applicable <input type="checkbox"/>			

Plaintiff expert proposed field of expertise:			
Defendant expert proposed field of expertise:			
	DONE	NOT APPLICABLE	DATE
a. Case-in-chief expert report due		✓	
b. Rebuttal expert report due		✓	
c. Depositions of experts to be completed		✓	
6. Completion of ALL DISCOVERY			Dec 2
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			Dec. 6
8. If District Judge requires Pre-Motion Conference, date to make request			Jan. 15, 2020
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule			
10. Joint Pre-Trial Order due (if no dispositive motion filed)			Feb. 12, 2020
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases		✓	
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification		✓	
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

PEGGY KUO
United States Magistrate Judge

Date